

John White, Esq., #1741
 White Law Chartered
 335 West First Street
 Reno, NV 89503
 775-322-8000
 775-322-1228 (fax)
john@whitelawchartered.com
 Attorney for Debtor

E-filed: 2/7/11

UNITED STATES BANKRUPTCY COURT
 DISTRICT OF NEVADA

In re:)	CASE NO: BK-N-10-51372
)	
ROGER PIERRE BAYLOCQ,)	Chapter 11
)	
)	EX PARTE MOTION FOR ORDER 1)
)	CONDITIONALLY APPROVING DEBTOR'S
)	DISCLOSURE STATEMENT WITHOUT A
)	HEARING, AND 2) SETTING A COMBINED
)	HEARING ON FINAL APPROVAL OF
)	THE DISCLOSURE STATEMENT AND
)	CONFIRMATION OF THE PLAN WITHIN 45
Debtor)	DAYS HEREOF.
	/	
		No Hearing Required

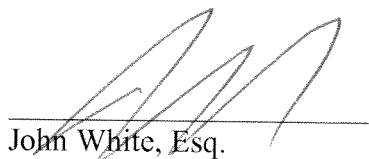
COMES NOW, DEBTOR ABOVE-NAMED ("Debtor"), pursuant to 11 USC Sec. 1129 (e), Bank.R.Civ.P. 3017 and LR3017, ex parte who seeks an order conditionally approving disclosure statement, setting a combined hearing for final approval of the disclosure statement and for confirmation of the plan, and setting required dates and times.

This pertains to and incorporates Debtor's Feb. 7, 2011 Disclosure Statement ("Disclosure Statement") and a Plan of Reorganization attached thereto which has been separately filed herein on this date.

This Case may qualify as a Small Business Case. 11 USC Sec. 1129 (e) sets a plan approval deadline no later than 45 days of its filing in a Small Business Case. Further, 11 USC requires the filing of a Plan within 300 days of the Petition date. The voluntary petition in

1 this case was filed on April 15, 2010, making the 300th day February 9th, 2011. It is therefore
 2 respectfully requested that the hearing on the Disclosure Statement and Plan be combined and
 3 that the combined hearing be set at a date and time on or before March 24, 2011, if this Court's
 4 calendar permits. Debtor further requests that the Court determine a time for the filing of any
 5 objections to the Plan or Disclosure Statement and a ballot deadline.
 6

7 Dated this 7th day of February, 2011.

8 
 John White, Esq.

9 Certificate of Counsel

10 I, John White, certify that I am counsel for the above-named debtor, and that to my best
 11 information and brief:

12 (i) the circumstances that favor the preliminary approval of the disclosure statement:

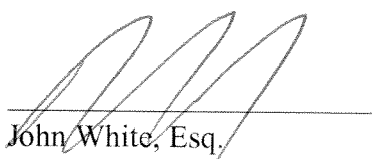
13 This is a cash-strapped individual Chapter 11 case with a struggling debtor who cannot afford
 14 two hearings. Further, it would be nearly impossible to meet that 11 USC sec. 1129(e) 45 day
 15 confirmation deadline if two hearings are required, Fed.R.Bank.P. 3017 requiring 28 days' notice
 16 for each.
 17

18 (ii) Total creditors, value and information;

19 The total number of creditors is 21, 7 of whom are secured. The gross value of debtor's
 20 assets as set forth in the Schedules is \$2,420,500.00; and
 21

22 (iii) that the proposed disclosure statement contains the information required by Official
 23 Form 25B.

24 Dated February 7th 2011.

25 
 26 John White, Esq.

27 WHITE LAW
 CHARTERED
 LAWYERS

28 20TH CENTURY BLDG.
 335 W. FIRST STREET
 RENO, NV 89503

T (775) 322-8000
 F (775) 322-1228